

EXHIBIT 3

DRAFT

**IF YOU ARE A DISTRIBUTOR THAT PURCHASED
BEARINGS IN THE UNITED STATES DIRECTLY FROM
ANY OF THE ENTITIES IDENTIFIED BELOW FROM
JANUARY 1, 2000 THROUGH DECEMBER 31, 2014,
YOUR LEGAL RIGHTS MAY BE AFFECTED BY A
PROPOSED SETTLEMENT WITH THE JTEKT,
NACHI, NSK, NTN, AND SKF DEFENDANTS**

A proposed settlement totaling \$37.5 million has been reached in *In re Automotive Parts Antitrust Litigation*, Master File No.12-md-02311, 2:12-cv-00501 (E.D. Mich.), 2:15-cv-12068 (E.D. Mich.), 2:15-cv-13932 (E.D. Mich.), and 2:15-cv-13945 (E.D. Mich.), with the JTEKT, Nachi, NSK, NTN, and SKF Defendants (collectively, the “Settling Defendants”).

What is the lawsuit about? This class action is part of coordinated legal proceedings involving Bearings purchased by distributors in the United States **directly** from a Defendant (as defined below). These proceedings do not relate to, and have no effect upon, cases involving any other product.

The term “Bearings” refers to friction-reducing devices used in both automotive and industrial machinery that allow one moving part to glide past another moving part. Examples include, but are not limited to, the following products: ball bearings, tapered roller bearings, needle roller bearings, roller bearings, and mounted bearings of any size. Direct Purchaser Plaintiffs allege that Defendants conspired to raise, fix, maintain, and/or stabilize prices, rig bids, and/or allocate markets and customers for Bearings sold to distributors in the United States in violation of federal antitrust laws. Plaintiffs further claim that because of the alleged conspiracy, they and other direct purchasers of Bearings were injured by paying more for those products than they would have paid in the absence of the alleged illegal conduct.

Plaintiffs have reached a settlement (“Settlement”) with the Settling Defendants totaling \$37,500,000 (the “Settlement Fund”).

Who is included? The Court has preliminarily approved the proposed Settlement and has provisionally certified the Settlement Class. You are a member of the Settlement Class if you are a distributor that purchased Bearings in the United States directly from any of the following entities (or their subsidiaries or affiliates) during the period from January 1, 2000 through December 31, 2014: JTEKT Corporation; JTEKT North America Corporation (formerly Koyo Corporation of U.S.A.); Koyo France SA; Koyo Deutschland GmbH; Nachi-Fujikoshi Corp.; Nachi America Inc.; Nachi Technology, Inc.; Nachi Europe GmbH; NSK Ltd.; NSK Americas, Inc.; NSK Europe Ltd.; NSK Corporation; NTN Corporation; NTN USA Corporation; NTN Wälzlager GmbH; NTN-SNR Roulements; Schaeffler Group USA Inc.; Schaeffler Technologies AG & Co. KG (formerly Schaeffler Technologies GmbH & Co. KG); FAG Kugelfischer GmbH; AB SKF; SKF GmbH; and SKF USA Inc.

Plaintiffs DALC Gear & Bearing Supply Corp., McGuire Bearing Company, Sherman Bearings, Inc., and Bearing Service, Inc. have been appointed by the Court to serve as “Class Representatives” for the Settlement Class. The Court has appointed the law firms of Freed Kanner London & Millen LLC, Kohn, Swift & Graf, P.C., Preti, Flaherty, Beliveau & Pachios LLP, and Spector Roseman & Kodroff, P.C. to serve as “Co-Lead Settlement Class Counsel” for the Settlement Class.

A Notice of Proposed Settlement and Claim Form (the “Notice”) was mailed to potential Settlement Class members on or about _____, 2021. The Notice describes the litigation and options available to Settlement Class members with respect to the Settlement in more detail. If you did not receive the Notice, you may obtain a copy on the internet at www.AutoPartsAntitrustLitigation.com/Bearings, or by calling or writing to any of the following Settlement Class Counsel:

Gregory P. Hansel
PRETI, FLAHERTY, BELIVEAU
& PACHIOS LLP
One City Center, P.O. Box 9546
Portland, ME 04112-9546
Telephone: (207) 791-3000

Joseph C. Kohn
KOHN, SWIFT & GRAF, P.C.
1600 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 238-1700

Steven A. Kanner
FREED KANNER LONDON
& MILLEN LLC
2201 Waukegan Road, Suite 130
Bannockburn, IL 60015
Telephone: (224) 632-4500

Eugene A. Spector
SPECTOR ROSEMAN & KODROFF, P.C.
Two Commerce Square
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Telephone: (215) 496-0300

What does the Settlement provide? The Settling Defendants have agreed to pay a total of \$37,500,000 to settle the class members' claims against them.

Your rights may be affected. If you are a member of the Settlement Class, you will automatically remain a member of the Settlement Class unless you elect to be excluded. If you wish to remain in the Settlement Class, you do not need to take any action at this time, and your interests will be represented by the Class Representatives and by Settlement Class Counsel. **To share in the proceeds of the Settlement, however, you must complete and timely submit a copy of the Claim Form that was mailed to potential Settlement Class members along with the Notice, postmarked on or before _____, 2021.**

If you wish to exclude yourself from the Settlement Class, you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than _____, 2021**, in accordance with the procedures set forth in the Notice. If you validly exclude yourself from the Settlement Class, you will not be bound by any decision concerning the Settlement Class and you can pursue individually any claims you may have against the Settling Defendants (at your own expense), but you will not be eligible to share in the proceeds from the Settlement.

If you remain a member of the Settlement Class, you have the right to object to the proposed Settlement, or to the proposed plan of distribution of the Settlement Fund, or to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses, by following the procedures set forth in the Notice. **Your objection must be filed no later than _____, 2021.**

The Court has scheduled a hearing on _____, 2021, to consider whether to approve: the proposed Settlement; the proposed plan of distribution of the Settlement Fund; and Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses. If the Court believes that it is appropriate, the hearing may be conducted remotely by telephone or other electronic means. If the Court determines to hold the hearing remotely, Settlement Class Counsel will post that information on the website devoted to the direct purchaser litigation (www.AutoPartsAntitrustLitigation.com/Bearings) and provide it to any Settlement Class member that has informed the Court that it intends to participate at the hearing, along with the information required to do so remotely. The hearing may be continued without further notice to you.

If you believe you are a member of the Settlement Class, you are urged to obtain a copy of the Notice, which explains your rights regarding the settlement and related matters.

If you have questions concerning this litigation, you may contact any of the Settlement Class Counsel identified above. **Do not contact the Clerk of Court or the Judge.**

Dated: _____, 2021

BY ORDER OF:
The United States District Court for the Eastern
District of Michigan, Southern Division